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23 ATTORNEYS FOR PLAINTIFF AND THE PROPOSED CLASS

24  
25 UNITED STATES DISTRICT COURT  
26 DISTRICT OF NEVADA

27 Maggie Thomson, as representative of a class  
28 of similarly situated persons, and on behalf of  
the Caesars Entertainment Corporation Savings  
& Retirement Plan,

Case No. 2:21-cv-00961-GMN-BNW

29  
30 v.  
31 Plaintiff,  
32  
33 Caesars Holdings Inc. and Russell  
34 Investment Management LLC,  
35  
36 Defendants.

37  
38 STIPULATION REGARDING  
39 AMENDED COMPLAINT AND  
40 DEADLINE TO ANSWER OR  
41 OTHERWISE RESPOND

1 Plaintiff Maggie Thomson, as representative of a class of similarly situated persons, and on  
 2 behalf of the Caesars Entertainment Corporation Savings & Retirement Plan, and Defendants  
 3 Russell Investment Management LLC (“RIM”) and Caesars Holdings, Inc. (collectively, the  
 4 “Parties”), by and through their undersigned counsel, hereby stipulate and agree that Plaintiff  
 5 Maggie Thomson, pursuant to Fed. R. Civ. P. 15(a), will file an amended complaint on or before  
 6 July 30, 2021, that an answer or response to the original complaint is not required, and that the  
 7 deadline for Defendants to answer or otherwise respond to the amended complaint shall be August  
 8 30, 2021. Plaintiff avers that there is good cause to enter into this stipulation to ensure that the  
 9 proper parties are before the Court.<sup>1</sup> Further, this stipulation is not made for purposes of delay, but  
 10 rather to ensure that the contemplated amendments are made before Defendants respond to the  
 11 existing Complaint.

12 Accordingly, the Parties request that the Court approve this stipulation and grant Defendants  
 13 until August 30, 2021 to answer or otherwise respond to Plaintiff’s amended complaint, which she  
 14 will file on or before July 30, 2021. Defendants do not waive any defenses by entering into this  
 15 stipulation nor are they agreeing that any newly-named defendant is a proper party or otherwise  
 16 engaged in any wrongdoing.

18 Dated: July 27, 2021

Dated: July 27, 2021

19 NICHOLS KASTER, PLLP

/s/ Benjamin J. Bauer

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27 <sup>1</sup> After meeting and conferring with Defendants, Plaintiff intends to file an amended complaint to  
 28 remove RIM as a defendant, add Russell Investments Trust Company (“RITC”) as a defendant,  
 and add the Investment Committee of the Caesars Entertainment Corporation Savings &  
 Retirement Plan as a defendant.

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27 *Management, LLC*

28 **Order**

1 IT IS SO ORDERED

2 DATED: 6:25 pm, July 29, 2021

3   
4 **BRENDA WEKSLER**  
5 **UNITED STATES MAGISTRATE JUDGE**